The following is a listing of comments made by superintendents in the space provided for additional comments within the survey.

Special Education Students

I am concerned that the NCLB Act seems to disregard special education students' their right to have an I.E.P. that is developed to meet their specific needs. In one instance we say that they can't meet normal curriculum standards because of their handicap and then NCLB says they must meet the same standards as every other student.

Great Plan except "Special ED" 7 "Limited English". If a student is advanced or proficient they would not be on an IEP. If they are profoundly "M.R." how can we expect them to be Adv. or Prof.? How can a student with "No" English speaking skills be expected to take a test in English & be advanced or proficient?

NCLB has made us examine what we do & make changes. However, certain aspects of NCLB are unrealistic, such as expecting special ed. students to achieve at grade level, and having all teachers be "highly qualified"

Our biggest struggles will be with SPED and Native American attendance. Because of small class sizes, 30% of students in any given class can be SPED students who work well below grade level but proficiently compared to their abilities.

Testing of subgroups must be changed to test at their ability, not age level.

Expectations need to be realistic & exceptions need to be made. Special Ed. will not ever make the level of proficiency that NCLB is recommending.

I am concerned about unrealistic expectations for SpEd subgroup.

Special Ed is a concern. Changes need to be made to take into account "progress" made not some "benchmark" that for some is truly unattainable.

The NCLB guidelines are not realistic in some area such as SPED & Limited English students.

Getting all students to proficiency is unrealistic and unattainable due to Special Education student's ability levels.

My biggest concern is testing special education students at grade level. This is in direct conflict with IDEA. Throughout the school year we do not test special education students at grade level nor is their work at grade level. Yet to determine progress we test at grade level. We will never get to the goal set by this act.

Our main concern is that we are testing Sp. Ed. students at their grade level but we should test them at their ability level. Would you like to take a test over curr [curriculum] that you have never seen?

It makes no sense to hold special education students to the same standard as other students and actually hurts their program.

Special Education students are not being recognized for their disability when they are expected to achieve at the same level as non-special education student who is at the same grade level.

Sp. Ed. should be tested at ability not age group.

We are 80% proficient or advanced on all grades in reading and math and we will be on school improvement because of special education. We don't have the time to jump through the hoops that we will have to with the school improvement requirement.

However the subgroups are especially in need of change because anyone who has works with students knows that special ed can not achieve the same level as regular students or they would not be called "special ed."

Special Education is a concern for me and I am not sure schools can meet this requirement.

I do not think that NCLB "proficiency standards are realistic for our special education students. By definition students in spec. ed are "not proficient in one or more areas because of a disability". Is it realistic to suddenly expect every student to gain proficiency at the same level as "age level peers"? Of course our goal is always for these students to achieve at the highest level possible but if they fall short of a set of standards that has nothing to do with their individualized plan I do not feel that the school has failed. Special education needs to meet the individual needs of the students involved and out time & effort is best spent working toward each students individual goals.

SPED students are not going to all become proficient, or they wouldn't be identified as SPED.

My concerns with NCLB are with the SPED subgroups. I do not believe it is possible to bring a 15 year old that has a 4th grade reading level to pass the 11th grade reading comprehension test.

We will go into school improvement because of Special Ed. NCLB and IDEA are not compatible.

I'm concerned about SPED. We have had for example a child with a brain tumor, which affects short term memory. Since we don't have many SPED students, the results can be so sporadic.

Dislike SPED Accountability

Federal law states you must provide educational experiences for SPED students at their academic level BUT NCLB says you test them at their age level not at their ability level. I think this is contradictory to SPED law.

Problems dealing with students on IEP. Students are on IEP's because they have identifiable problems in the learning process. NCLB & IDEA are complete opposite. How can you identify a student to work on an Individual Education Plan because he has learning problems and then say that he needs to be at the same level as other students when the school is trying to make his own goals from the IEP.

I believe NCLB is not likely to survive for very long. It is too idealistic to mandate special ed and ghetto-raised children are going to <u>all</u> be proficient by a certain time.

The one big issue is the special education population. I believe making them test at grade level instead of where there are at academically is a gross violation of their civil rights.

Our most difficult task will be dealing with the special needs students. There is little hope to move these students along according to present guidelines. Special needs students have learning difficulties not shared by most students. They can and will learn but not at the rate set out by guidelines of NCLB.

Can all students, especially special education students really be held accountable for the SAME standards of academic proficiency as other students – unless the standards are so very, very low that the standards mean nothing.

I have no problem with the concept of accountability as mandated by NCLB. Making decisions that are based on student data to improve instruction and increase student achievement is how we've conducted business long before the implementation of NCLB. However, the punitive nature of the legislation over issues that are outside the control of a district is a major concern to me. Our district will never make AYP because of the transient student population, excessively high number of special education students that attend our school, and high absenteeism. We have an extensive special education program that provides services many of our area schools cannot ---therefore, resulting in a high number of students with special needs attending our schools. We also have a high number of students who transfer in and out of our district for a variety of reasons for varying lengths of time. We have students who regularly miss 40+ days of school per year, even though we provide door-to-door busing, parent awareness training, student attendance incentive, etc.

In spite of all these issues, our students, who have good attendance and are consistently enrolled in our district, experience the appropriate gains and achievement each year. However, many of the attendance and transient students do not show that growth and may account for more than 50% of our student population on any given day. I think the "powers to be" need to take these types of issues into consideration and assess each district accordingly. Just like in the classroom, there is no "one size fits all" model, yet the federal and state Departments of Education appear to think there is, and are measuring all districts the same.

Another area of frustration is the "veiled threats" of public notification of school improvement status. Our staff members are working diligently in all areas to improve instruction and increase student growth, and yet, must endure the stigma that is attached to having their school improvement status printed in the local newspapers, along with notification to parents. This does little to improve and/or support staff morale in the areas that traditionally have problems attracting and retaining high quality staff. Finally, if the NCLB legislation actually enforces the punitive nature of the law and removes staff, leadership, and the governing board, of schools that do not meet AYP within the specified timelines, I suggest they simply take over those districts now instead of waiting until 2010. Our district, and many like us, simply will not be able to meet the mandated goals, in spite of the extensive amount of work we've done with staff and the achievement we've gained with the students we're able to serve consistently.

In addition to the comments on the prior page, one additional concern regarding special education is becoming apparent. Because one of the criteria for eligibility as a student

with a learning disability in SD has been an achievement/ability gap, as soon as the gap has been closed, the student is dismissed from the program. When special education progress is tracked as a group rather than by individual student and students leave the program during the year and re-enter the general education population, it can become impossible for that group to make AYP. This happened at one of our schools where several students made significant progress and were dismissed during the school year. An obvious solution would be to dismiss at the end of the school year, but that would only temporarily delay the problem.

Concerns- SPED, Limited English

Expecting Special Education to achieve- advance or proficient- is not realistic. Simple: If they did not qualify (1.5 standard deviation) they would not be receiving special education services. For our students, we are just reinforcing the idea that those students are losers.

Special education students will not be able to meet the requirements of NCLB. These students should be separate of the district (AYP).

The intent of NCLB is admirable, but the 100% proficient goal is impractical and particularly unfair in trying to recognize growth in special needs students. Even the allowances made assumes these severely handicapped students are evenly distributed which is rarely the case.

Special students being held to same level of achievement. (Listed as a concern) Time frame same for all population of at risk kids from poverty situation.

Eliminate the requirement for special education students. If students are in SPED then they are special and need to be treated as special. Have faith in the local IEP committee to determine their special needs and have confidence in the local persons and parents to do what is right for special students.

I have concerns about subgroups requirements – SPED. This law is setting us up to fail. All students can not be above average! This law is set up to make all public schools look bad. So the public money can be used in private schools.

Special Ed students & NCLB – Work has to be done with this to make it equitable for that population. There is a reason why they are on an IEP plan & NCLB seems to want to overlook that. We need to fix that part of NCLB.

Testing Sp. Ed. Students at "Grade Level" rather than "Instructional Level" seems foolish --- Why set students up for failure when their IEP is designed for success?

Unrealistic expectation placed on special ed students.

The subgroup of Sp. Ed. meeting AYP is the part of NCLB that I object to most strongly.

I'm waiting for a lawsuit when I publicly announce my SPED subgroups did not make AYP which in turn puts the school on alert.

Goals

It is unlikely that all children will achieve to the level required by the law. Children have strengths and weaknesses and achieve at different level.

It is fine to set goals but please set goals that are realistic. It is impossible to have ALL children attain these goals.

I don't think it's realistic to expect all sts[students] to be proficient anytime.

I would encourage realistic goals along with procedures to reach them other than imposing penalties for failure to meet goals.

Right now it's impossible w/out [without] modifications.

It is unrealistic to believe that a "1 size fits all" federal law will work in urban and rural areas. It is unrealistic to believe that all sub-groups will score proficient by 2013-14. If special ed students score at their achievement level and not at their grade level it may work. Otherwise the scores will never be there.

I'm concerned that "every" child will be advanced/proficient by 2014. Some students are not capable of being in that category- through no fault of their own. Dysfunctional families will complicate matters only more what they are.

Proficiency for "all students" by 2013-014 is, simply, an unreachable goal (without modifications).

I agree with the concept of NCLB. I agree with the goal of 100% Adv.[Advanced] & proficient. This is unrealistic but a good goal.

The NCLB goals are hard to argue with however many are unrealistic. The NCLB Act puts most of the responsibility on the schools, which makes a high stress climate for educators.

The bad thing about NCLB is that we are evaluating students and schools based on the results of one test. This is not realistic.

... has added staff in the math and science areas to allow for more individual attention but there will be some students that even with our best efforts they will not score at the proficient level, This is the part of NCLB that concerns me the most.

NCLB will improve our school, NCLB will not bring about proficiency for "ALL" students.

Instead of subgroups to be proficient or advanced, perhaps look at improvement. Not everyone is capable of achieving prof/adv. That's why there's SPED and other programs for at-risk students

We were taught that the words all, always, and never should be used rarely. Failure becomes very probable when the words ALL, NEVER, and ALWAYS are used.

Good in theory. Some parts are not realistic.

Unattainable - 100% proficiency for all students.

Minority Children

Getting minority students to school so we can teach them is our biggest concern.

Our biggest struggles will be with SPED and Native American attendance. We also struggle with attendance because it only takes one or two students with poor attendance to bring down a racial group consisting of between 10 and 15 students. Health care seems to be our biggest struggle with IHS [Indian Health Services] and dentist scheduling appointments during the school day as well as social services lack of concern for students who miss around 10 days per semester or 20 for the year. Under NCLB's 95% attendance rate, a student can only miss 9 days for the entire year.

White Children

Not counting scores of white children because they are less than 10 in a classroom hurts because their scores are high. Our white children are the minority but are not viewed that way.

Parental Issues

Many parents simply don't care about education so it is hard to change views.

"Accountability", this seems to be the essence of NCLB. The problem is that NCLB does not hold accountable one of the most important links in a child's education and that is the parent. Most of the student problems we have are a result of parents not being responsive to their child's educational needs. We need to hold parents accountable for doing their part in their child's education.

This Act does nothing to hold parents responsible for what is going on in their child's life.

Who came up with the idea 100%? Why hasn't parent accountability, split families & others being held accountable for poor achievement. Let's just dump the blame on the schools. A great attitude for our elected officials to have.

We still need a wake up call for parents.

The NCLB Act does not take into account the home and community component which directly reflects on academic performance.

Perhaps a parenting program should be put in place for schools with low performance rather than pulling federal money.

Free and reduced lunch students have some family/experience barriers to overcome from the different resources I've read.

Additional Work/Time taken

"NCLB appears to be the driving force behind everything we do in our district; from meetings to curriculum to staff hiring. Curriculum, textbook purchase, professional development time have all changed since NCLB became primary focus. Every year we spend hours analyzing scores and student progress. For us, where our students comprise every subgroup, we are beginning to wonder whether all the time & energy we spend (and not meeting) NCLB is worth it. The law is "beating" us down- there is no time for anything else."

Unfunded Mandate/Under funded

Also, I believe it [NCLB] is one more unfunded mandate, and while it may receive some additional funding, it is definitely underfunded.

Full funding of the program would help.

Lack of additional funding to help meet requirements of NCLB.

Will money be there when we need it to meet the rules of the law.

This process is a big undertaking w/[with] very little financial help. We continue to do more & expect to get better w/[with] less.

More mandates- Federal & State – that are not funded. High stress level on local budgets that are already strained.

I fear that the program will be woefully underfunded as is typical with Federal Government Initiatives.

Our federal funds keep decreasing each year & the feds want more from the schools. That is becoming impossible. If the feds cannot fully fund their mandates, they should not be able to enact the laws. Congress should be held to the same accountability as the groups they want to govern. Bottom line: Pay up or stay out of education!

There has not been one additional dollar coming directly to school districts or a result of NCLB. The additional federal dollars get consumed by the DOE for testing, implementation, in-service activities, etc. Though these additional things sponsored by the DOE might be necessary to meet NCLB requirements – they do not directly help school districts that are having financial difficulties. Take the extra funds and give them directly to school districts so they can hire more teachers to put in the classrooms. Otherwise, classrooms of 20-25+ students per teacher will never reach the proficiency goals of NCLB.

Under funded from Title I, under funded from non-Title I

There has not been adequate dollars from the feds to make any changes. As enrollment declines, dollars available decline but expenses do not decline accordingly. If we need to make NCLB changes but have less dollars, how are we to make the changes?

We are getting less federal funding each year however, and makes this task difficult.

Proper funding will be necessary to carry out the mandates of NCLB. It is not likely local funding will be available.

Local Control

Student achievement should be left at the local level. All schools have a school improvement plan and this plan should drive curriculum and instruction therefore NCLB is not needed.

I think the federal government should stay out of education. It is a state responsibility.

It is not the right of the Federal Gov't to do any of this. Read the Constitution. It is another example of States losing rights. In this case it makes good politics for Federal office holders and does not address real needs in schools. Federal run schools have the worse scores in our state. Maybe they should see if they can do their job before telling states how to do their job.

Get rid of NCLB. The Federal Govt. should not be dictating to local school districts.

Schools should be run by the local people (taxpayers) in SD via the SD DOE, not the federal gov't.

Philosophically, NCLB is good. Schools should be held accountable for student achievement. That accountability should be done by the states not the federal government.

Highly Qualified Teachers/paraprofessionals

When "Highly Qualified" goes into effect, schools will be unable to comply especially in science and social science.

Provisions for teachers to become highly qualified [when] courses are not available for teaching staff. Examples: speech, library science.

Highly qualified teachers may be impossible with teacher shortage.

Certified aides are hard for us to come by in remote locations. People just aren't willing to qualify any other way if they can't pass the test.

NCLB should give money to school districts that hire "highly qualified" teachers to increase their salaries to keep them in education.

I have great concerns in regard to the "Highly Qualified Teachers" – certification in all areas will be a problem for small schools.

Miscellaneous

We also need to continue to educate the public on NCLB rather than just reporting scores.

NCLB has forced us to be aware that we are following our content standards for lesson preparation.

Education goes beyond test results. This Act has reduced education to rote memorization and will eliminate the process of teaching kids to "learn".

S. Dak. Does not fund education properly so we do not need to spread our meager resources any thinner.

The training for school improvement schools by the DOE has been weak and generally unhelpful. We actually lost our Guidance Counselor to the title of "Test Coordinator" for the absolute ridiculous amount of testing we are subjecting our students to at a time when we really now have to only concentrate on the basic and below basic students! We are actually leaving many behind by blindlessly swallowing the NCLB guides from the fed! A joke!

If the law's truly "no child left behind"- what accommodations are being made or addressed for "Home-Schooled" students'? What about those students who attend private and/or parochial schools?

I wonder what President Kerry will do with NCLB?

Staff is being hired to be "highly qualified" but colleges need to work with the graduates also. The district hired an English teacher last year and now finds she's not qualified to teach speech. She said she took elective classes & had she known she'd taken speech classes. Now, she has to pick up the credits and the district will pay for it.

Money is not always the problem... or the answer.

Although the Dakota STEP is fine as an assessment, it is only <u>one</u> measure of how well our students are achieving ... a "snapshot", if you will. The test should only be one of many assessments measuring achievement/progress.

It's difficult for me to believe that small schools were taken into consideration when the outlines of NCLB were developed.

NCLB in my opinion was a sound good politically motivated solution to a problem that didn't exist in all schools. It smells of "nation at Risk". Too long public schools have been underfunded and then blamed for economic and social ills over which they have no control.

Schools and Districts should not be judged solely on the Dakota STEP results. Test results should only be one factor in accountability and how well a school/district is performing. Testing every year may become tedious for students who then may not put full effort on the tests. There are always some students who don't try which doesn't give an accurate portrail of what he/she knows. This seems to be an issue if test results are holding teachers/schools accountable but not individual students and parents.

Drastic changes will be difficult because of the financial situation in SD. Legislators do not believe education is a priority and the majority of people in SD are not willing to pay their <u>fair</u> share of taxes to support education properly. I believe the state department is trying to help but again the department is politically controlled and is not financed properly. The state department should be independent of the governor's office

NCLB is flawed legislation which does not improve instruction.

AYP should be determined through multiple measures of student's abilities and not just one test.

If a subgroup fails to meet AYP then that subgroup should be put on school improvement, not the entire school. A student should only be counted in <u>one</u> subgroup, not several, ie, special ed and economically disadvantaged.

Our state department of education ...have done an excellent job of approaching NCLB in a "helping" manner to SD schools.

Like DOE's help with NCLB.

The SD DOE is doing as much as they can to try to assist the schools with limited resources that will never be enough to fulfill the requirements of NCLB.

Dakota STEP- norm referenced questions as a base conflict with criterion referenced intent.

Eliminate the subgroups by increasing the required size for a subgroup to be valid.

There is little or no understanding of our culture, its needs, and how culture affects education due to historical facts. I would guess this is true because both cultures believe that they are suffering the results of one culture failing to understand another. Toss in the loss of SD's white population with the huge growth in Native population, and you have a nice scene for the blame game and more. People need to communicate more, more, more.

I have no problem with assessment but all students do not test equally.

State department needs to provide additional information to schools so they can meet AYP. They need to help schools develop improvement plans and provide resources.

Culture varies to improvement of achievement scores.

Districts are all different with their own unique problems. Can't put every district in one nutshell.

Each teacher is more accountable- this is good. Not good- subgroups are being blamed for all our problems. To [too] much testing – some people do not test well.

Unrealistic to believe <u>ALL</u> will be proficient --- some don't care --- desire and capacity are huge issues.

Smothering impact on creativity by individual teachers, must devote most of their time to items that will impact AYP.

The measurements for calculating AYP need to be changed. South Dakota needs to review what other states have done to control the variables of testing. There is a huge difference between SAT scores and NAPE scores. South Dakota students did well on NAPE scores, yet so many schools end up "on alert" and "school improvement". The 1% cap for special education students is totally unrealistic.

Likes

Standards are making schools teach what is important. Given everyone direction.

NCLB has allowed us to focus on individual students and their abilities. It has also made us make conscious effort to align our curriculum with state standards.

"MAKE SURE OUR ASSESSMENTS REFLECTS OUR STANDARDS!"

NCLB has required that we take a hard look at our programs and make adjustments to our instruction at all levels.

I like

- ? Accountability
- ? Standards-based teaching
- ? Use of data data based decision making
- ? Increased professional development for staff
- ? Research-based instructional strategies

I think NCLB is a great tool for education.

Higher standards for all students

NCLB is generally in the best interest of everyone involved in the education process. Accountability is very important and all educators need to realize that we all can improve.

It is good that parents, teachers, administrators, students and the public is [are] focused on improving education.

Helped drive needed change.

I appreciate the DOE's efforts to make compliance with NCLB more practical and reasonable.

Measurement of the effectiveness of schools/districts should be determined by using more than one test – Dakota STEP. District measurements could also be utilized such as portfolios, satisfaction/climate surveys, etc.

Our state department of education is doing a great job of helping us meet the goals of NCLB.

NCLB is on the right track. We do need to let parents & students know that they have a responsibility to perform or achieve at their highest level at all times. It isn't just the school and its staff that has a stake in NCLB.